

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA

MELINDA SCOTT, )

Plaintiff )

v. )

Case No. 2:20cv14

)

WISE COUNTY DEPT. )

of SOCIAL SERVICES, )

et al )

)

)

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION

FROM DEFENDANT JOSHUA MOON

COMES NOW, the Plaintiff, in accordance with Rule 34, and by statement of this court, and requests the following information from Defendant Joshua Moon. This request is that you, Defendant Joshua Moon, produce the following to Plaintiff Melinda Scott through electronic delivery to the email below *and* by postal mail to the postal address of the Plaintiff:

DEFINITIONS

1. "Email address" means the email address used for sign up on KiwiFarms.net
2. Profile "TheJumpingDwarf" is the profile that was used to create the first article about Plaintiff Melinda Scott on March 13, 2017.

3. Profiles “Rafal Gan Ganowicz”, “Deadpool”, and “Karl\_der\_Grosse” are profiles that post within the KiwiFarms.net “lolcow” thread entitled “Melinda Leigh Scott & Marshall Castersen” that originated by profile “Null” on July 7, 2017.
4. “Communication” means any form of communication, whether by telephone, voicemail, electronic texts, postal mail, e-mail or private messenger apps used within KiwiFarms.net or other social media sites.


### **INSTRUCTIONS**

1. Produce the following information in the “Requests” below, according to the “Definitions” above, through email *and* postal mail in readable formats through PDF, copies of originals, JPG images, screenshots and typed lists. Email and postal mail for the Plaintiff are listed below within the signature below.

### **REQUESTS**

1. Produce the date of sign up for the profiles “TheJumpingDwarf”, “Rafal Gan Ganowicz”, “Deadpool”, and “Karl\_der\_Grosse”.
2. Produce the email addresses of the profiles “TheJumpingDwarf”, “Rafal Gan Ganowicz”, “Deadpool”, and “Karl\_der\_Grosse” used to sign up on your site, KiwiFarms.net.

3. Produce all email addresses used by the profiles "TheJumpingDwarf", "Rafal Gan Ganowicz", "Deadpool", and "Karl\_der\_Grosse" while changing settings or user profile information on KiwiFarms.net the entire time their profile has existed.
4. Produce any alternate profiles associated with, linked with or connected with the profiles "TheJumpingDwarf", "Rafal Gan Ganowicz", "Deadpool", and "Karl\_der\_Grosse".
5. Produce the full legal names of the profiles "TheJumpingDwarf", "Rafal Gan Ganowicz", "Deadpool", and "Karl\_der\_Grosse".
6. Produce any fictional names or aliases used by the profiles of the profiles "TheJumpingDwarf", "Rafal Gan Ganowicz", "Deadpool", and "Karl\_der\_Grosse".
7. Produce all IP addresses used by of the profiles "TheJumpingDwarf", "Rafal Gan Ganowicz", "Deadpool", and "Karl\_der\_Grosse" between the date the profile signed up on KiwiFarms.net and service of these requests.
8. Produce the telephone numbers associated with of the profiles "TheJumpingDwarf", "Rafal Gan Ganowicz", "Deadpool", and "Karl\_der\_Grosse".
9. Produce any records of volunteer service or employment by KiwiFarms.net for of the profiles "TheJumpingDwarf", "Rafal Gan Ganowicz", "Deadpool", and "Karl\_der\_Grosse".
10. Produce the city, state, and country of residence information of the profiles "TheJumpingDwarf", "Rafal Gan Ganowicz", "Deadpool", and "Karl\_der\_Grosse".
11. Produce the date of birth of profiles "TheJumpingDwarf", "Rafal Gan Ganowicz", "Deadpool", and "Karl\_der\_Grosse".
12. Produce any communications whatsoever you have had with the following profiles:  
"TheJumpingDwarf", "Rafal Gan Ganowicz", "Deadpool", and "Karl\_der\_Grosse".



BY: Melinda Scott, *pro-se*

PO BOX 1133-2014PMB87

Richmond, VA 23218

mscottw@gmu.edu

540-692-2342

#### CERTIFICATE OF SERVICE

I hereby certify that I have both mailed a copy of PLAINTIFF FIRST REQUEST FOR PRODUCTION to the Defendant, Joshua Moon, at 913 Beal Pkwy NW, Suite A-1017, Fort Walton Beach, FL 32547 and by electronic delivery to [josh@1776hosting.com](mailto:josh@1776hosting.com) on this 5th day of NOV., 2020.



Melinda Scott, *pro-se*

PO BOX 1133-2014PMB87

Richmond, VA 23218

mscottw@gmu.edu

540-692-2342